

**RECEIVED** IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA  
Northern Division

2006 JUN -7 P 2:44

A. G., a minor child, by and through )  
her mother and next of friend, et al., )

Plaintiffs, )

vs. )

CASE NO. 2:05cv1090-MEF

AUTAUGA COUNTY BOARD )  
OF EDUCATION, et al., )

Defendants. )

**CITY OF PRATTVILLE'S RESPONSE TO COURT'S ORDER TO SHOW CAUSE  
AND RENEWED MOTION FOR PROTECTIVE ORDER**


COMES NOW the City of Prattville, a municipal corporation, by and through their attorney in fact, and respectfully responds to this Court's Order to show cause and moves for entry of the attached proposed Protective Order, and in support of this Motion states as follows:

1. That a subpoena was issued on the 14<sup>th</sup> day of November 2005, by Michael Crow, attorney for the Plaintiffs, to be served upon the City of Prattville, a municipal corporation, requesting information regarding reports of abuse at Autauga County Schools from October 1 through October 28, 2004.

2. That this Court's Order of May 9, 2006 ordered Defendants to Show Cause as to why the motions for protective order should not be denied in light of "Plaintiffs' Response to Prattville Police Department's Motion to Quash" (Doc.#28) filed April 28, 2006.

3. That attorney for the City of Prattville would show that any or all records produced by the City of Prattville will contain information about the minor victims which is sensitive and confidential in nature, and would violate the juveniles' right to privacy under federal and state law.

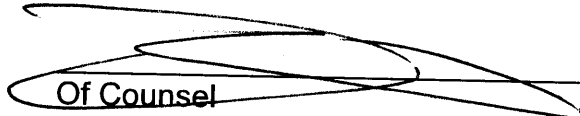
WHEREFORE, the premises considered, the City of Prattville respectfully requests this Honorable Court to enter the attached proposed Protective Order as it relates to the documents submitted, per this Court's Order of February 14, 2006, and prays for such other, further and different relief to which they may be entitled in the premises.

  
DAVID A. McDOWELL (MCD037)  
Attorney for City of Prattville, a municipal corporation

McDowell, Faulk & McDowell, LLC  
145 West Main Street  
Prattville, AL. 36067  
(334)365-5924

CERTIFICATE OF SERVICE

I hereby certify that I have this the 27<sup>th</sup> day of June, 2006, served a copy of the foregoing upon counsel of record, as set out below, by placing same in the U. S. Mail, postage prepaid and properly addressed to each.

  
Of Counsel

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AUTAUGA COUNTY BOARD )  
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)  
Defendants. )**

**PROTECTIVE ORDER**

Upon consideration of the City of Prattville's renewed motion for entry of a Protective Order, and this Court having considered same, it is

**ORDERED, ADJUDGED and DECREED as follows:**

1. All records produced by the City of Prattville to any party, counsel or other persons affiliated or associated with the case, that contain information about the minor plaintiffs shall be marked "Confidential Information" and shall be treated as such by all persons, including, but not limited to, all parties, counsel, and the persons affiliated or associated with the case directly or indirectly, to whom such information is disclosed, pursuant to the terms of this Order; and
2. That the confidential information is to not be disseminated to the public in any form; and

3. That any confidential information received shall be destroyed upon this Case being dismissed with prejudice; and

4. That any violation of this Order may result in a finding of contempt of court and said party will be subject to penalties imposed by this Court.

DONE and ORDERED this the \_\_\_\_ day of June, 2006.

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SUSAN RUSS WALKER  
UNITED STATES MAGISTRATE JUDGE